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VIA FEDERAL EXPRESS

April 30, 1991



CORNING

Ms. Evette Bryant
Superfund Program Management Branch 5HSM-TUB-7
United States EPA
230 South Dearborn Street
Chicago, Illinois 60604

Re: Albion-Sheridan Township Landfill, Calhoun County,
Michigan - Request for Information

Dear Ms. Bryant:

Corning Incorporated ("Corning"), having made diligent efforts to collect the information necessary to provide answers to the United States Environmental Protection Agency's Information Request ("Request") dated March 25, 1991 regarding the above-referenced site, responds as follows:

General Objections

Corning objects to the Requests on the grounds that the time frame for response is unduly and unreasonably burdensome and the information sought is irrelevant and/or not reasonably calculated to lead to the discovery of admissible or relevant evidence. Corning also objects on grounds that the Request exceeds the statutory mandate of Section 104 (e) of CERCLA.

Corning objects to the Requests to the extent they seek documents exempt from disclosure by virtue of the attorney-client privilege, work product immunity or any other applicable privilege and to the extent they seek (a) documents containing information which is confidential and/or consists of trade secrets or proprietary information and (b) documents containing information which Corning has agreed with persons other than defendants to treat as confidential and not to disclose to any third party.

Corning understands the US EPA's Request to refer only to Corning's former Albion, Michigan plant, because that is the only Corning facility which could have allegedly used the subject landfill.

No information provided herein is an admission of any liability with respect to the subject site. Moreover, Corning hereby requests that E.P.A. provide to the undersigned copies of all documents in E.P.A.'s possession which relate to Corning's alleged shipments of waste materials to the Albion-Sheridan Township landfill.

Responses

1. Mr. Vern Wainwright and Tracy Anderson.

2. A search of Corning's records has yielded no documents responsive to this request other than the document attached hereto. Other than that document, answers provided here have been based upon personal recollection only.

3. Mr. Vern Wainwright, former head of maintenance department at Corning's Albion, Michigan plant.

4. There is no E.P.A. number for the Albion plant as the plant was closed in the late 1970's.

5. A search of Corning's records has yielded no documents responsive to this request.

6. Mr. Vern Wainwright.

7. A search of Corning's records has yielded no documents responsive to this request.

8. **Comprehensive General Liability:**

1/1/60-6/3/60 Insurance Company of North America, Policy No. 9 CGL 122543 no pollution exclusion.

6/3/60-1-1-63 Insurance Company of North America, Policy NO. CGL 122543 no pollution exclusion.

1/1/63-1/1/67 Insurance Company of North America, Policy NO. LB 29150 no pollution exclusion.

1/1/67-1/1/69 Insurance Company of North America, Policy No. ALB 39787 no pollution exclusion.

1/1/69-1/1/70 Home Insurance Company, Policy NO. GA 99939-48 no pollution exclusion.

1/1/70-1/1/71 Home Insurance Company, Policy No. Ga 9853000 no pollution exclusion.

1/1/71-1/1/72 Home Insurance Company, Policy No. GA 9944686 no pollution exclusion.

1/1/72-4/1/73 Lumbermens Insurance Company, Policy No. 2ZL 576200 coverage for sudden and accidental pollution.

4/1/73-4/1/74 Lumbermens Insurance Company, Policy No. 3ZL 576200 coverage for sudden and accidental pollution.

4/1/74-4/1/75 Lumbermens Insurance Company, Policy No. 4ZL 576200 coverage for sudden and accidental pollution.

4/1/75-4/1/76 Lumbermens Insurance Company, Policy No. 5ZL 576200 coverage for sudden and accidental pollution.

4/1/76-4/1/77 Lumbermens Insurance Company, Policy No. 6ZL 576200 coverage for sudden and accidental pollution.

4/1/77-4/1/78 Lumbermens Insurance Company, Policy No. 7ZL 576200 coverage for sudden and accidental pollution.

4/1/78-4/1/79 Lumbermens Insurance Company, Policy No. 8ZL 576200 coverage for sudden and accidental pollution.

4/1/79-4/1/80 Lumbermens Insurance Company, Policy No. 9ZL 576200 coverage for sudden and accidental pollution.

Corning also has excess liability coverage. The Albion plant closed in the late 1970's, therefore Corning has provided insurance information for the period 1960 through 1980 only.

9. No documents have been produced in response to this request as these documents are publicly available. For your convenience a copy of Corning's 1990 annual report is attached hereto. Corning's general financial information is voluminous. If specific relevant information is sought we will attempt to supply it.

10. Corning's Albion, Michigan plant was a manufacturing facility for glass television picture tubes. The glass parts were formed by pressing and spinning techniques and were finished into shape using grinding and polishing operations.

11. Calcium fluoride sludge was an indirect production waste resulting from the manufacturing and waste neutralization process.

CORNING INCORPORATED


By: Andrea Kojm Thomas
Assistant Counsel

Enclosure